

**KESSLER TOPAZ MELTZER
& CHECK, LLP**

JENNIFER L. JOOST (Bar No. 296164)
(jjoost@ktmc.com)
One Sansome Street, Suite 1850
San Francisco, CA 94104
Tel: (415) 400-3000
Fax: (415) 400-3001

*Counsel for Proposed Lead Plaintiff E. Öhman
J:or Fonder AB and Proposed Lead Counsel for
the Class*

**BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP**

JONATHAN D. USLANER (Bar No. 256898)
(jonathanu@blbglaw.com)
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
Tel: (858) 793-0070
Fax: (858) 793-0323

*Counsel for Proposed Lead Plaintiff Stichting
Pensioenfond's PGB and Proposed Lead Counsel
for the Class*

[Additional counsel appear on signature page.]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

In Re NVIDIA CORPORATION
SECURITIES LITIGATION

Case No. 4:18-cv-07669-HSG

CLASS ACTION

**REPLY MEMORANDUM OF POINTS
AND AUTHORITIES IN FURTHER
SUPPORT OF THE UNOPPOSED
MOTION OF E. ÖHMAN J:OR
FONDER AB AND STICHTING
PENSIOENFONDS PGB FOR
APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF THEIR
SELECTION OF COUNSEL**

Date: May 9, 2019
Time: 2:00 p.m.
Dept.: Courtroom 2, 4th Floor
Judge: Hon. Haywood S. Gilliam, Jr.

Moreover, Öhman Fonder and PGB also satisfy Rule 23's adequacy requirement because they are capable of fairly and adequately protecting the interests of the Class, and there is no conflict of interest between Öhman Fonder and PGB and those of other Class members. *See* 15 U.S.C. § 78u-4(a)(3)(B)(iii)(II)(aa). As set forth in their Joint Declaration, Öhman Fonder and PGB are two sophisticated institutional investors which collectively manage over \$39 billion in assets, have been working collaboratively to oversee this action since before they filed their motion to be appointed, fully understand the Lead Plaintiff's obligations under the PSLRA, and have affirmed their commitment to achieving the best possible result for the Class. *See* ECF No. 81-2.

Öhman Fonder and PGB have also selected qualified counsel to prosecute this matter. Kessler Topaz and Bernstein Litowitz are two of the most preeminent securities class action law firms in the country. *See* ECF Nos. 42 at 10-13; 42-6; 42-7. Öhman Fonder and PGB's selection of Kessler Topaz and Bernstein Litowitz as Lead Counsel on behalf of the Class is unopposed and the PSLRA instructs that a movant's selection of counsel should not be disturbed absent extraordinary circumstances not present here. *See* 15 U.S.C. § 78u-4(a)(3)(B)(v).

For the reasons stated in their papers and herein, Öhman Fonder and PGB respectfully request that the Court appoint them Lead Plaintiff, approve their selection of Kessler Topaz and Bernstein Litowitz as Lead Counsel for the Class, and grant such other relief as the Court may deem just and proper.

Dated: March 12, 2019.

Respectfully submitted,

**KESSLER TOPAZ MELTZER
& CHECK, LLP**

/s/ Jennifer Joost
JENNIFER L. JOOST (Bar No. 296164)
(jjoost@ktmc.com)
One Sansome Street, Suite 1850
San Francisco, CA 94104
Tel: (415) 400-3000
Fax: (415) 400-3001

-and-

NAUMON A. AMJED (appearance *pro hac vice*)
(namjed@ktmc.com)
DARREN J. CHECK (appearance *pro hac vice*)
(dcheck@ktmc.com)

1 RYAN T. DEGNAN (appearance *pro hac vice*)
2 (rdegan@ktmc.com)
3 280 King of Prussia Road
4 Radnor, PA 19087
5 Tel: (610) 667-7706
6 Fax: (610) 667-7056

7 *Counsel for Proposed Lead Plaintiff E. Öhman J:or*
8 *Fonder AB and Proposed Lead Counsel for the*
9 *Class*

10 **BERNSTEIN LITOWITZ BERGER**
11 **& GROSSMANN LLP**

12 JONATHAN D. USLANER (Bar No. 256898)
13 (jonathanu@blbglaw.com)
14 12481 High Bluff Drive, Suite 300
15 San Diego, CA 92130
16 Tel: (858) 793-0070
17 Fax: (858) 793-0323

18 -and-

19 JEROEN VAN KWAWEGEN
20 (jeroen@blbglaw.com)
21 AVI JOSEFSON
22 (avi@blbglaw.com)
23 MICHAEL D. BLATCHLEY (appearance *pro hac*
24 *vice*)
25 (michaelb@blbglaw.com)
26 1251 Avenue of the Americas
27 New York, NY 10020
28 Tel: (212) 554-1400
Fax: (212) 554-1444

Counsel for Proposed Lead Plaintiff Stichting
Pensioenfonds PGB and Proposed Lead Counsel
for the Class